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Attorneys for Defendants PHH MORTGAGE
CORPORATION and LIBERTY HOME EQUITY
SOLUTIONS, INC.

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UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

MICHAELA LANERE, an individual, on
behalf of herself, and on behalf of all
persons similarly situated,

Plaintiffs,

v.

PHH MORTGAGE CORPORATION a New
Jersey corporation, d/b/a LIBERTY
REVERSE MORTGAGE; LIBERTY HOME
EQUITY SOLUTIONS a
California limited liability company and
DOES 1-50, Inclusive,

Defendants.

Case No. 2:24-cv-00652-DJC-SCR

**STIPULATION TO CONTINUE CASE
DEADLINES AND ORDER**

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1 Plaintiff Michaela Lanere and Defendants PHH Mortgage Corporation (“PHH”)
2 and Liberty Home Equity Solutions, Inc. (“Liberty”) (collectively the “Parties”) hereby
3 submit this Stipulation to Continue Case Deadlines. The Parties stipulate as follows:

4 1. On January 23, 2024, Plaintiff filed her wage-and-hour putative class action
5 against PHH, Liberty, Ocwen Financial Insurance Services, Inc., and Ocwen USVI
6 Services, LLC in the Superior Court of California for the County of Sacramento.

7 2. On February 29, 2024, PHH and Liberty removed this action to the United
8 States District Court, Eastern District of California.

9 3. On March 5, 2024, the Parties met and conferred to discuss Defendants’
10 anticipated Motion to Dismiss and/or Strike Plaintiff’s Complaint and Plaintiff’s
11 anticipated Motion to Remand. The Parties also discussed mediation and potential
12 settlement of the case.

13 4. During the meet and confer, Plaintiff agreed to amend her Complaint to
14 address some of the issues Defendants raised regarding the parties, claims and
15 allegations, and she filed her First Amended Complaint (“FAC”) on March 6, 2024. The
16 Parties also agreed to mediate the matter and requested a 60-day continuance of case
17 deadlines to allow time for the Parties to agree on a mediator, reserve a mediation date
18 and explore potential resolution of this matter, which the Court granted. See Dkt No. 10.

19 5. Upon stipulation from the Parties, the Court further granted an additional
20 90-day continuance of case deadlines to allow the Parties to mediate and explore
21 potential resolution of the matter. See Dkt. No. 12.

22 6. The Parties have since mediated the matter on July 24, 2024 and have
23 accepted a mediator’s proposal to resolve this case. The Parties now agree to seek an
24 additional 60-day continuance of case deadlines so that the parties may finalize the
25 terms of the settlement and draft and execute the settlement agreement.

26 7. PHH and Liberty’s deadline to file their responsive pleading to Plaintiff’s
27 FAC is currently August 19, 2024.

28 8. Plaintiff’s deadline to file her Motion to Remand is currently August 29,

2024.

9. The deadline for the Parties to meet and confer and submit a Joint Status report is currently September 26, 2024.

10. Accordingly, to promote judicial economy and efficiency, the Parties request that the Court continue the case deadlines by 60-days as follows:

- a. Deadline for PHH and Liberty to file a responsive pleading: **October 18, 2024**;
- b. Deadline for Plaintiff to file her Motion to Remand: **October 28, 2024**; and
- c. Deadline for Parties to meet and confer and submit a Joint Status Report as required by the Court's Initial Case Management Order and Federal Rules of Civil Procedure 26(f): **November 25, 2024**.

IT IS SO STIPULATED.

Dated: August 14, 2024

JULIE A. TOTTEN
ANNIE H. CHEN

ORRICK, HERRINGTON & SUTCLIFFE
LLP

By: /s/ Annie H. Chen
ANNIE H. CHEN
Attorneys for Defendants PHH
MORTGAGE CORPORATION and
LIBERTY HOME EQUITY
SOLUTIONS, INC.

1 Dated: August 14, 2024

JEAN-CLAUDE LAPUYADE
MONNETT DE LA TORRE
ANDREA ALEJANDRA AMAYA SILVA

JCL LAW FIRM, APC

5 By: /s/ Monnett De La Torre
MONNETT DE LA TORRE
Attorneys for Plaintiff MICHAELA
LANERE

9 **ATTESTATION**

10 I hereby attest that concurrence in the filing of this document has been obtained
11 from each of the other signatories hereto.

14 Dated: August 14, 2024

By: /s/ Annie H. Chen
Annie H. Chen

ORDER

The Court having considered the Parties' Stipulation to Continue Case Deadlines and finding good cause, hereby GRANTS the Parties' request to continue case deadlines and ORDERS as follows:

1. The deadline for PHH and Liberty to file a responsive pleading is continued to October 18, 2024;

2. The deadline for Plaintiff to file a Motion to Remand is continued to October 28, 2024; and

3. The deadline for the Parties to meet and confer and submit a Joint Status Report as required by the Court's Initial Case Management Order and Federal Rules of Civil Procedure 26(f) is continued to November 25, 2024.

DATED this 14th day of August, 2024.

/s/ Daniel J. Calabretta

THE HONORABLE DANIEL J. CALABRETTA
UNITED STATES DISTRICT JUDGE